

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA) Case No. 15-10390-PBS
)
)
)
v.)
)
)
JAYME GORDON)
)
)
Defendant)

JOINT STATUS REPORT

The parties jointly file this status report addressing the issues outlined in Local Rule 116.5(B).

1-2. The status of discovery and timing of additional discovery to be produced:

The government has provided automatic discovery. Because most of the evidence in this case arises from the civil suit that Gordon filed against DreamWorks, he or his civil attorneys already have this material. The government will likely have some, but not much, additional material to produce as trial approaches.

3. Timing of additional discovery requests

The defendant will request additional discovery material and the government will respond as promptly as possible. The parties do not anticipate discovery disputes in this case.

4. Need for protective orders – not currently necessary because of agreement

The parties agree that material produced in discovery in this case is to be used only for the purpose of this criminal case and is not to be used for any other purpose or disclosed publicly or to people not involved in this litigation. In light of this agreement, the parties do not see the need for a protective order at this time. If this changes, the parties will request an order from the Court.

5. Pretrial motions

The parties do not anticipate pretrial motions.

6. Expert witness disclosures

The government will produce any expert witness reports 45 days before trial. The defense will produce expert reports 30 days before trial.

7. Defense of insanity, public authority, or alibi

The defendant does not intend to assert any of these defenses.

8. Speedy Trial

The Court has excluded the time from initial appearance on 12/21/15 through the initial status conference on 1/25/16. The parties jointly ask the Court to exclude all time from this initial status conference to the next one. This time is excludable, under 18 U.S.C. § 3161(h)(7)(A), on the grounds that the ends of justice served by allowing the defendant time to review discovery and request any additional discovery material outweighs the interests of the public and defendant in a speedy trial.

9. Status of Plea Discussions; Likelihood and Length of Trial

Counsel have had informal discussions about whether this case could be resolved with a plea or would need to be tried, all of which defense counsel has relayed to the defendant. There has been no formal plea offer. At this point, it appears that the case will proceed to trial.

10. Timing of Further Status Conferences

The parties ask the Court to schedule a final status conference in approximately 45 days.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Adam Bookbinder

Dated: January 21, 2016